

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EDUARDO GARCIA and JULIE GARCIA,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No. 1:20-cv-02402

Hon. Rebecca R. Pallmeyer

ORAL ARGUMENT REQUESTED

**WELLS FARGO BANK, N.A.’S MOTION TO COMPEL INDEPENDENT MEDICAL
EXAMINATION OF PLAINTIFFS**

Defendant, Wells Fargo Bank, N.A., by and through its undersigned counsel, respectfully request that this Court enter an order compelling the independent medical examinations of Plaintiffs Eduardo Garcia and Julia Garcia (“Plaintiffs”). The grounds for this motion are more fully set forth in Defendant’s Memorandum of Law in Support of Motion for Order to Conduct an Independent Medical Examination of Plaintiffs.

WHEREFORE, Defendant request that the Court enter an order compelling Plaintiffs to undergo independent medical examinations.

Dated: April 11, 2022

Respectfully submitted,

/s/ Shawn R. Obi

Shawn R. Obi (*pro hac vice*)
Winston & Strawn LLP
333 South Grand Avenue
Los Angeles, CA 90071

Phone: 213-615-1700
Fax: 213-615-1750
Email: SObi@winston.com

Christopher Parker
Winston & Strawn LLP
35 West Wacker Drive
Chicago, IL 60601
Phone: 312-558-8085
Fax: 312-558-5700
Email: cparker@winston.com

Angela A. Smedley (*pro hac vice*)
Winston & Strawn LLP
200 Park Avenue
New York, NY 10166
Phone: 212-294-5348
Fax: 212-294-4700
Email: asmmedley@winston.com

Attorneys for Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of April 2022, the foregoing was filed electronically with the Clerk of the Court for the United States District Court for the Northern District of Illinois, and was served by operation of that Court's electronic filing system, upon the following:

Rusty A. Payton
Payton Legal Group
20 North Clark Street, Suite 3300
Chicago, Illinois 60602
(773) 682-5210
info@payton.legal

Salvador J. Lopez
Robson & Lopez, LLC
180 W. Washington Street, Suite 700
Chicago, Illinois 60602
(312) 525-2166
lopez@robsonlopez.com

Nicholas H. Wooten
Nick Wooten, LLC
5125 Burnt Pine Drive
Conway, Arkansas 72034
(833) 937-6389
nick@nickwooten.com

Attorneys for Plaintiff

/s/ Shawn R. Obi